

CC Docket No. 94-102 – Status Report

Filed by: Key Communications, L.L.C.
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Date: May 1, 2006

To: Marlene H. Dortch, Secretary
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By Electronic Submission:

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STATUS REPORT
Due May 1, 2006
CC Docket No. 94-102

Key Communications, L.L.C. ("Key") hereby submits its E911 Status Report, pursuant to *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems; Request for Waiver of Deadlines for Implementation of Phase II E911 of Key Communications, LLC and Keystone Wireless, LLC*, CC Docket No. 94-102, *Order*, 20 FCC Rcd 16927 ¶19 (2005).

Carrier Identifying Information:

Carrier Name: Key Communications, L.L.C. – FRN 0005 4134 63

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Information Regarding PSAPs:

As of Key's February 1, 2006 Status Report, Key had received nine Phase I requests and nine Phase II requests. Key has not received any new PSAP requests since that date. As previously reported, Key obtained and installed all of the network equipment and software necessary to meet the Phase I requests, installed land lines between the switch and the requesting PSAPs for Phase I deployment, and is compliant with all Phase I requests.

Since the submission of its November 21, 2005 Supplement to its Phase II E-911 waiver request ("Supplement"), Key has updated all of the requesting PSAPs on the status of its implementation of Phase II E-911, and provided each of them with a copy of the Supplement and of the February 1, 2006 Status Report. Additionally, Key has spoken several times over the past three months with Dannie Walker at the West Virginia Public Utilities Commission, who serves as the liaison with the West Virginia PSAP directors, regarding status of Key's implementation of Phase II E-911. Mr. Walker has not expressed any concerns or issues, either himself or on behalf of any individual PSAP, respecting Key's Phase II E-911 implementation efforts. Key has also been in contact with the Raleigh County PSAP to fine tune the Phase I E-911 service in that county, and that PSAP did not raise any questions or concerns respecting Key's Phase II E-911 implementation efforts.

Implementation of Phase II Service:

As previously reported, Key is committed to using a network-based solution for Phase II E-911 in its market and has been exploring the network-based solutions being developed by Polaris Wireless, Inc. ("Polaris") -- the Wireless Location Signature ("Polaris WLS") -- and by GBSD Technologies, Inc. ("GBSD") -- The Compass™ Location System ("The Compass™") -- among others. To date, GBSD is still not ready to conduct an analysis of Key's network based on The Compass™ technology.

Upon further analysis of Key's network based on the Polaris WLS technology, Polaris again concluded that its network-based solution would not be viable for Key's current network configuration because the Polaris WLS technology would not meet the Phase II E-911 accuracy requirements under §20.18(h) of the Commission's rules. For the Polaris WLS to be viable in Key's network, Key would have to construct many additional cell sites to even get close to meeting the accuracy requirements, cell sites that are not required for customer traffic and whose sole purpose would be to support the Polaris WLS Phase II E-911 solution. The costs for construction of all of these additional cell sites and the purchase of the required Polaris WLS equipment are prohibitive. In addition, Key's monthly expenses would increase greatly due to the need to lease additional space at all of its current cell sites for the Polaris WLS equipment. Key finds this to be the same situation with other network-based Phase II E-911 technologies it has explored. Notably, while the Polaris WLS technology, like the NORTEL option, would benefit from AGPS handsets, such handsets continue to be unavailable.

In light of the foregoing, Key does not anticipate that Phase II E-911 service will be available in its network in the near future. Key is continuing to search out and explore other network-based Phase II solutions in the hopes of finding a viable solution for its market, and continues to aim toward a target date of December 31, 2006, for implementation of a Phase II E-911 solution within its network.

Construction of New Cells and Expansion of Coverage:

Key is currently finalizing its 2006 build-out plans for its network. Key anticipates that it will be some time in the late second quarter or early third quarter of the year before any new sites begin operating.